

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:18CR00810 HEA
	)	
LACIA ALLEN,	)	
	)	
Defendant.	)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S SENTENCING MEMORANDUM**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy Lynn Berry, Assistant United States Attorney for said District, and files its response to defendant’s sentencing memorandum.

The government submits that the imposition of a with-in the guideline sentence is sufficient, but not greater than necessary, to comply with the sentencing objectives of Section 3553(a). The government submits that such a sentence is important in view of the nature and circumstances of the offense and the defendant’s history and characteristics, the need to reflect the seriousness of the offense, the need to provide just punishment for the offense, and the need to protect the public from further crimes of the defendant.

In view of defendant’s extensive criminal history and her engagement in additional criminal conduct while on probation and supervised release, the government submits that a guideline sentence is appropriate. The government also notes that defendant’s assertions that she did not intend to defraud fly in the face of her guilty plea admissions and the facts underlying the

conviction. This failure to minimize her criminal liability fully supports the imposition of a guideline sentence.

Based upon the aforementioned grounds, the government submits that a guideline sentence is appropriate.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

s/ Tracy L. Berry  
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**CERTIFICATE OF SERVICE**

I, TRACY L. BERRY, Assistant United States Attorney for the Eastern District of Missouri, hereby certify that a copy of the foregoing motion has been e-mailed to Aryka Moore, Esq.

This 22nd day of July, 2019.

s/ Tracy L. Berry  
TRACY L. BERRY  
Assistant United States Attorney